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December 6, 2024

Via Electronic Filing

Honorable Rukhsanah L. Singh, U.S.M.J.
United States District Court
Clarkson S. Fisher Bldg. & U.S. Courthouse
402 E. State Street
Trenton, NJ 08608
United States District Court, District of New Jersey, Newark

Re: Marganski, Mark v Mogavero, Autumn M. et al.
Docket No. 3:24-CV-01289
Our File No. 03324-8215

Dear Magistrate Singh:

The Defendants are not requesting extraordinary relief, but simply an additional sixty-days to complete a deposition, obtain a medical exam, and ensure we have all relevant records and diagnostic studies. Good cause has been shown for an extension that, to my understanding, is usually afforded the parties. Plaintiff has essentially, “run out the clock” so as to avoid providing common-place discovery, and the FRCP do not condone parties obstructing the normal course of discovery. Had the plaintiff, 1) appeared for his deposition on **November 14**, and 2) appeared for his IME on **December 4**, fact discovery would as of today, essentially be complete.

Honorable Rukhsanah L. Singh, U.S.M.J.
December 6, 2024
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Respectfully submitted

A handwritten signature in blue ink, appearing to read 'T. Morrone', is written over a faint, larger blue signature that appears to read 'J. Monaco'.

THOMAS A. MORRONE
FOR THE FIRM

TAM:jl2

c: Joseph Monaco, Esq.
Craig Squitieri, Esq.
Melissa Bishop, Esq.